

## **REMARKS**

### **Amendments**

#### ***Amendments to the Claims***

Applicant has amended the independent claims to recite linguist feature-value pairs and associated semantic concepts and the user thereof as described in the Specification. No new matter has been added as a result of these amendments.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 103***

##### **Claims 1-88**

Claims 1-88 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent 5,033,087 to Bahl et al. in view of U.S. Patent 6,121,082 to Hargrave III, et al. and further in view of U.S. Patent 5,887,120 to Wiscal. Applicant respectfully submits that the combination of Bahl, Hargrave and Wiscal does not teach each and every element of the invention as claimed in claims 1-88.

Bahl discloses a speech recognition system that creates a decision tree structure that represents variations in the pronunciation of phonemes based on their context in training data. When speech is received, the system determines what word was spoken by comparing the context of the received speech with the contexts in the structure.

Hargrave discloses a structure for translating text strings from a source to a target language. The structure includes an inverted index containing an entry for each unique n-gram found in sample documents in the source language. Each entry contains a weight for the n-gram, a list of pointers to "posting vectors" for the n-gram, and a count of the number of posting vectors.

Wiscal discloses a content processing system that determines themes for input discourse using ontology databases that contain inter-related knowledge concepts.

Applicant's claims 1-88 recite linguist feature-value pairs and associated semantic concepts, and further recite the use of those claimed elements. As none of Bahl, Hargrave and Wiscal teach or suggest Applicant's claimed linguist feature-value pairs and associated semantic concepts, nor the claimed use of the linguist feature-value pairs and

associated semantic concepts, the combination cannot render obvious Applicant's invention as claimed in claims 1-88. Therefore, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination of Bahl, Hargrave and Wiscal.

### SUMMARY

Claims 1-88 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

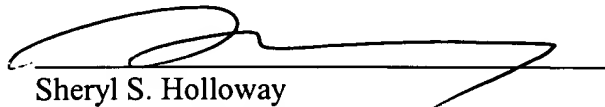
### Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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& ZAFMAN LLP

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